

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Robert Manchel, Esq.
1 Eves Drive, Suite 111
Marlton, NJ 08053
Attorney for Debtors
RM-1141

In Re:

John C. and Denise D. Bartholomew

Case No. 17-35995KCF

Judge:

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtors in the above-captioned chapter 13 proceeding hereby object to the following
(**choose one**):

1. X Motion for Relief from the Automatic Stay filed by Colonial Savings, FA,
creditor. A hearing has been scheduled for February 13, 2019, at 9:00 a.m.

OR

 Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has
been scheduled for at a.m.

OR

 Certification of Default filed by , creditor. We are
requesting that a hearing be scheduled on this matter.

OR

 Certification of Default filed by Standing Chapter 13 Trustee.
We are requesting that a hearing be scheduled on this matter.

2. We are objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

X Other: We will make a payment of \$4,000 by January 31, 2019. We wish to resume regular mortgage payments as of February 2019 and capitalize the balance of the arrears through our Chapter 13 bankruptcy plan. We respectfully request the court deny the movant's request for relief & allow us to continue with our bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. We certify under penalty of perjury that the foregoing is true and correct.

Date: 1/4/2019

/s/ John C. Bartholomew
John C. Bartholomew, debtor

Date: 1/4/2019

/s/ Denise D. Bartholomew
Denise D. Bartholomew, debtor